

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

NATIONAL ASSOCIATION FOR GUN RIGHTS, and)	
SUSAN KAREN GOLDMAN,)	
)	
Plaintiffs,)	Case No. 22-cv-04774
)	
v.)	
)	
CITY OF HIGHLAND PARK, ILLINOIS,)	
)	
Defendant.)	

DECLARATION OF DUDLEY BROWN

1. My name is Dudley Brown. I am over the age of 18 and have personal knowledge of the matters set forth in this Declaration.

2. Section 136.001 of the Highland Park City Code of 1968 (the “Code”) defines the term “assault weapon.” The term “assault weapon” as used in the Code is not a technical term used in the firearms industry or community for firearms commonly available to civilians. Instead, the term is a rhetorically charged political term meant to stir the emotions of the public against those persons who choose to exercise their constitutional right to possess certain semi-automatic firearms that are commonly owned by millions of law-abiding American citizens for lawful purposes. For purposes of this Declaration, the term “Banned Firearm” shall have the same meaning as the term “assault weapon” in Section 136.001 of the Code.

3. Section 136.001 of the Code defines the term “large-capacity magazine” to mean any firearm magazine capable of holding more than ten rounds of ammunition. The Code again uses politically charged rhetoric to describe the arms it bans. The Code’s characterization of these magazines as “large capacity” is a misnomer. Magazines capable of holding more than 10

rounds are standard capacity magazines. For purposes of this Declaration, the term “Banned Magazine” shall have the same meaning as the term “large-capacity magazine” in Section 136.001 of the Code.

4. The members of the National Association for Gun Rights on whose behalf this action is brought are residents of the City of Highland Park and law-abiding citizens of the United States. They are otherwise eligible under the laws of the United States and the City to receive and possess firearms and magazines, including the Banned Firearms and Banned Magazines. They intend to and, but for the credible threat of prosecution under the Code, would acquire Banned Firearms and Banned Magazines to keep in their homes for self- defense and for other lawful purposes.

I, Dudley Brown, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury that I have reviewed the foregoing, that I am competent to testify in this matter, and that the facts contained therein are true and correct



Dudley Brown

Date: September 26, 2022